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6 *Attorneys for Defendant*

7 REPUBLIC SILVER STATE DISPOSAL, INC. d/b/a  
8 REPUBLIC SERVICES OF SOUTHERN NEVADA

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 MICHAEL MILLER,

13 Plaintiff,

14 v.

15 INTERNATIONAL BROTHERHOOD OF  
16 TEAMSTERS, LOCAL 631; REPUBLIC  
SERVICES OF SOUTHERN NEVADA,

17 Defendants.  
18

Case No. 2:21-cv-01693-RFB-NJK

**STIPULATION TO EXTEND TIME  
FOR DEFENDANT TO FILE  
RESPONSE TO OPERATIVE  
COMPLAINT**

**[SECOND REQUEST]**

19 Plaintiff MICHAEL MILLER (“Plaintiff”) and Defendant REPUBLIC SILVER STATE  
20 DISPOSAL, INC. d/b/a REPUBLIC SERVICES OF SOUTHERN NEVADA, (“Defendant”) by  
21 and through their counsel of record, hereby stipulate and agree to extend the time for Defendant to  
22 file a response to the operative complaint by fourteen (14) days from either (1) the filing of the  
23 Second Amended Complaint or (2) the denial of Plaintiff’s Motion for Leave to Amend. This is  
24 the second request for an extension of time to respond to the Amended Complaint. After Defendant  
25 filed the first request for an extension (**ECF No. 21**), Plaintiff filed a Motion for Leave to Amend  
26 (**ECF No. 25**). As of the date of this stipulation, no opposition to Plaintiff’s Motion for Leave to  
27 Amend has been filed.  
28

As Defense counsel was recently retained in this case, this extension is necessary to provide additional time for Defense counsel to prepare a response to the operative Complaint. Additionally, given that no opposition to the Motion for Leave to Amend has been filed, and in an effort to conserve resources, the parties agree to the time prescribed in FRCP 15(a)(3) to respond to an amended pleading. *See* FRCP 15(a)(3) (“Unless the court orders otherwise, any required response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later.”).

The instant request is made in good faith and not for the purpose of delay.

Dated: December 17, 2021

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Respectfully submitted,

Respectfully submitted,

/s/ Trevor J. Hatfield, Esq.

TREVOR J. HATFIELD, ESQ.

*Attorneys for Plaintiff*  
MICHAEL MILLER

/s/ Diana G. Dickinson, Esq.

ETHAN D. THOMAS, ESQ.  
DIANA G. DICKINSON, ESQ.  
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*Attorneys for Defendant*  
REPUBLIC SILVER STATE DISPOSAL, INC.  
d/b/a REPUBLIC SERVICES OF SOUTHERN  
NEVADA

**IT IS SO ORDERED.**

Dated: December 20, 2021.



UNITED STATES DISTRICT JUDGE

4892-4478-9255.1 / 068119-2312